

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

SANDRA FOY JOHNSON, individually,)	
and on behalf of the ESTATE OF)	
DONALD JOHNSON, deceased,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 4:16-CV-256-WTM-GR
)	
CORIZON HEALTH, INC., a Tennessee)	
Corporation; CORIZON LLC, a Missouri)	
limited liability company; JOHN WILCHER)	
in his capacity as CHATHAM COUNTY)	
SHERIFF; CLAYTON M. RAMSU, M.D.;)	
and JOSEPH G. MOYSE, M.D.,)	
)	
Defendants.)	

MOTION FOR RECONSIDERATION

NOW COME Plaintiffs and request that the Court reconsider its August 7, 2017, Order denying Plaintiffs' Motion to Extend Discovery. Notwithstanding that the Court issued a Scheduling Order in December 2016 allowing over seven months for the parties to identify experts and complete fact discovery, the Court specifically notes in its Order that Plaintiffs did nothing past serving their initial disclosures. By June 28, 2017, the Court's original Scheduling Order indicated that Plaintiffs needed to identify expert witnesses. None were identified.

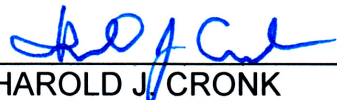
Plaintiffs simply want to notify the Court that their prior counsel did not diligently prosecute their case between December 2016 and June 2017 when Plaintiffs' prior counsel

withdrew. Since Plaintiffs' prior counsel did not diligently pursue discovery, Plaintiffs are now totally without the means to adequately litigate their case. Plaintiffs simply wanted to request any reconsideration on the Court's part in their reliance on prior counsel which has now jeopardized their entire case.

Accordingly, Plaintiffs request that the Court reconsider its Motion and allow at least a minimum of three months for all new discovery dates.

Respectfully submitted this 14th day of August, 2017.

HAROLD J. CRONK, P.C.
Professional Corporation

BY: 
HAROLD J. CRONK
STATE BAR NO. 197397

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served all counsel of record in the foregoing matter with a copy of this document

_____ by hand delivery; or



by placing a copy of the same in the United States mail with

adequate postage thereon addressed as follows:

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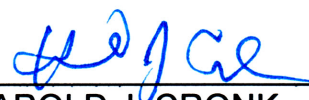
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This 14th day of August, 2017.

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